



January 19, 2024

**Columbia Gulf Transmission, LLC**

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The Honorable Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: Columbia Gulf Transmission, LLC  
Docket No. CP20-527-000  
East Lateral XPress Project  
Request for Extension of Time

Dear Ms. Bose:

Columbia Gulf Transmission, LLC (“Columbia Gulf”) hereby respectfully requests an extension of time, until September 25, 2025, to construct and make available for service the facilities associated with Columbia Gulf’s East Lateral XPress Project (“Project”) in the above referenced docket. In support hereof, Columbia Gulf states the following:

On March 25, 2022, the Federal Energy Regulatory Commission (“Commission” or “FERC”) issued its Order Issuing Certificate (“Order”) granting Columbia Gulf a certificate of public convenience and necessity for the Project in the above-referenced docket.<sup>1</sup> The Order authorizes Columbia Gulf to construct and operate the Project located in St. Mary, Lafourche, Jefferson, and Plaquemines Parishes, Louisiana.

Pursuant to Ordering Paragraph (B)(1) of the Order, Columbia Gulf is required to construct the facilities associated with the Project and make them available for service within two years of the date of the Order, or by March 25, 2024. Due to unforeseen delays in obtaining all federal authorizations required for the Project, Columbia Gulf requires additional time to complete construction of the authorized Project facilities. All required federal permits were recently obtained and on December 5, 2023, as supplemented, Columbia Gulf filed a request with the Commission for Notice to Proceed with construction of the Project.<sup>2</sup> On December 14, 2023, the Commission granted Columbia Gulf’s request.<sup>3</sup> Columbia Gulf subsequently mobilized crews and commenced bona fide construction activities on December 21, 2023.<sup>4</sup> As noted in Columbia Gulf’s Implementation Plan filed with the Commission,<sup>5</sup> construction is anticipated to be complete during Q4 of 2024 with Project in-service anticipated by February 1, 2025.

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<sup>1</sup> *Columbia Gulf Transmission, LLC*, 178 FERC ¶ 61,198 (2022).

<sup>2</sup> *Columbia Gulf Transmission, LLC*, Request for Notice to Proceed with Constructed filed on December 5, 2023, in Accession No. 20231205-5091, as supplemented on December 6, 2023, in Accession No. 20231206-5065, and on December 11, 2023, in Accession No. 20231211-5061.

<sup>3</sup> Letter Order Granting Notice to Proceed with Construction issued December 14, 2023, in Docket No. CP20-527.

<sup>4</sup> *Columbia Gulf Transmission, LLC*, Notice of Commencement of Construction filed December 26, 2023, in Accession No. 20231226-5129.

<sup>5</sup> *Columbia Gulf Transmission, LLC*, Implementation Plan filed on June 3, 2022, in Accession No. 20220603-5137, as supplemented on December 13, 2023, in Accession No. 20231213-5064.

The Project continues to be required by the public convenience and necessity for the reasons set forth in the Order, and a revised schedule for the Project due to unforeseen permitting delays will not alter the public interest findings underlying the Order. The precedent and service agreements executed with the Project shipper for the full capacity of 725,000 Dth/d (183,000 Dth/d of incremental service made possible by the proposed construction and 542,000 Dth/d of existing available transportation service) remain in effect and continue to demonstrate need for the Project. Furthermore, no changes in the Project have been made that would alter the results of the Commission's environmental review.

Pursuant to 18 C.F.R. § 385.2008 of the Commission's regulations, the time by which any person is required or allowed to act under any statute, rule, or order may be extended by the decisional authority for good cause, upon a motion made before the expiration of the period prescribed or previously extended. As the Commission has explained, good cause can be shown by a project sponsor demonstrating that it has made good faith efforts to meet its deadline but has encountered unforeseen circumstances.<sup>6</sup> The Commission has regularly found that providing more time for a project applicant to obtain necessary permits is an appropriate basis for granting an extension of time.<sup>7</sup>

For the reasons set forth above, there is good cause for the Commission to grant an extension of time, until September 25, 2025, to construct the Project facilities and make them available for service. Columbia Gulf does not request amendment to any of the terms and conditions of the Order other than the extension of time requested herein. The requested extension of time will allow Columbia Gulf the ability to safely construct and place the Project into service in an area prone to seasonal hurricane weather. Accordingly, Columbia Gulf hereby requests that the Director of the Office of Energy Projects, pursuant to the authority delegated to the Director under Section 375.308(w)(4) of the Commission's regulations,<sup>8</sup> grant Columbia Gulf an extension of time to complete the authorized construction of the Project facilities and make such facilities available for service by September 25, 2025.

Columbia Gulf is e-filing this request in accordance with the Commission's Order No. 703, *Filing Via the Internet* guidelines, issued in the Docket No. RM07-16-000 on November 15, 2007. Pursuant to 18 C.F.R. § 385.2010 of the Commission's regulations, a copy of this letter is being served to each person whose name appears on the official service list for this proceeding.

Pursuant to 18 C.F.R. § 385.2005 of the Commission's regulations, the undersigned states that he has read this filing and knows its contents, and the contents are true as stated, to the best of his knowledge, information and belief based on representations by Columbia Gulf's personnel. The undersigned possesses full power and authority to sign such filing.

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<sup>6</sup> *Const. Pipeline Co., LLC*, 165 FERC ¶ 61,081, at P 9 (2018) (citing *Arlington Storage Co., LLC*, 155 FERC ¶ 61,165, at P 8 (2016)).

<sup>7</sup> See, e.g., *Mountain Valley Pipeline, LLC*, 185 FERC ¶ 61,208 at P. 14 (2023) [Add TCO Eastern Panhandle Approval from last year] *Adelphia Gateway, LLC*, 178 FERC ¶ 61,030, at P 15 (2022) *Northwest Pipeline, LLC*, 171 FERC ¶ 61,077 at P 13 (2020); *Algonquin Gas Transmission, LLC*, 170 FERC ¶ 61,144 at P 32 (2020); *PennEast Pipeline Co., LLC*, 170 FERC ¶ 61,138 at P 7 (2020).

<sup>8</sup> 18 CFR §375.308(w)(4)

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Please direct any questions regarding this submission to the undersigned or Tina Vinton at 832.320.5686.

Respectfully submitted,

*/s/ David A. Alonzo*

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cc: Pamela Boudreau (FERC)  
Rich McGuire (FERC)  
Shannon Jones (FERC)  
Shannon Crosley (FERC)  
All parties of record